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12 Attorneys for Plaintiff
Rambus Inc.

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17 RAMBUS INC.,
18 Plaintiff,
19 v.
20 INTERNATIONAL BUSINESS MACHINES
CORPORATION,
21 Defendant.

CASE NO. C 10-03736 JSW
(Related Case: C 10-04017 JSW)

STIPULATION RE: CASE SCHEDULE;
SUPPORTING DECLARATION OF TINA
E. HULSE;
[PROPOSED] ORDER

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Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Rambus Inc. (“Rambus”) and Defendant International Business Machines Corporation (“IBM”), through their respective counsel of record, respectfully request, and with the Court’s permission, stipulate to a four-week extension of the current case schedule to allow the parties to effectively discuss settlement. More specifically, with the Court’s permission, the parties hereby stipulate that the current schedule set forth in the January 18, 2011, Civil Minute Order [Dkt. 50] be modified as follows:

EVENT	CURRENT SCHEDULE	PROPOSED DATE
Exchange of Preliminary Claim Constructions and Extrinsic Evidence (Patent L.R. 4-2(a), (b))	April 18, 2011	May 16, 2011
Meet and confer re Joint Claim Construction and Prehearing Statement (Patent L.R. 4-2(c))	April 25, 2011	May 23, 2011
Last day to request leave to designate additional terms for claims construction JSW Standing Order ¶ 4	April 29, 2011	May 27, 2011
Joint Claim Construction and Prehearing Statement (Patent L.R. 4-3) – Includes Expert Testimony. Parties must attach copies of patents, make available file histories to Court for each involved patent	May 13, 2011	June 10, 2011
Completion of Claim Construction Discovery (Patent L.R. 4-3)	June 13, 2011	July 11, 2011
Rambus Opening Claim Construction Brief (Patent L.R. 4-5(a)). 25 page limit	June 27, 2011	July 25, 2011
IBM Responsive Claim Construction Brief (Patent L.R. 4-5(b)). 25 page limit	July 11, 2011	August 8, 2011

EVENT	CURRENT SCHEDULE	PROPOSED DATE
Rambus - Reply Brief and any evidence directly rebutting the supporting evidence (Patent L.R. 4-5(c)). - 15 page limit	July 18, 2011	August 15, 2011
Amended Joint Claim Construction Statement		
Tutorial for the Court	August 9, 2011	September 6, 2011 , or any later date, subject to the convenience of the Court's calendar 9/7/2011 at 1:30pm
Claim Construction ("Markman") Hearing (Patent L.R. 4-6).	August 23, 2011	September 20, 2011 , or any later date, subject to the convenience of the Court's calendar 9/21/2011 at 1:30 pm

By her signature below, counsel for Plaintiff attests that counsel for Defendant concurs in the filing of this stipulation.

Respectfully submitted,

Date: April 14, 2011

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

By: /s/ Tina E. Hulse

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15 Dated: April 14, 2011

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23 Attorneys for Defendant,
24 International Business Machines Corporation

SUPPORTING DECLARATION OF TINA E. HULSE

I, TINA E. HULSE, declare as follows:

1. I am an associate at Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P., counsel for Plaintiff Rambus Inc. (“Rambus”). I submit this declaration in support of the parties’ Stipulation Regarding Case Schedule. I make this declaration of my own personal knowledge and will competently testify thereto if called upon to do so.

2. On January 18, 2011, the Court entered a Civil Minute Order (“Order”) [Dkt. 50] following the initial Case Management Conference. The Order instructed the parties to follow IBM’s proposed claim construction briefing schedule set forth in the January 14, 2011, case management statement [Dkt. 49]. The Order also set the technology tutorial for August 9, 2011, at 1:30 p.m. and the Markman Hearing for August 23, 2011, at 1:30 p.m.

3. The parties, both the respective corporate representatives and outside counsel, have been actively discussing resolution of this case. Accordingly, the parties have met and conferred and agree that continuing the case schedule for four weeks will facilitate these settlement discussions.

4. There have been no previous time modifications of the case schedule set forth in the Order. Otherwise, the only time modification in this case was to change the Case Management Conference from December 3, 2010, to January 14, 2011, to coincide with the hearing on Rambus's motion to dismiss in related case, *International Business Machines Corp. v. Rambus Inc.*, No. C 10-04017 JSW. See Dkt. 48.

5. The requested modification in the current case schedule will not affect any other pre-trial deadlines, as the pre-trial schedule has not yet been entered in this case.

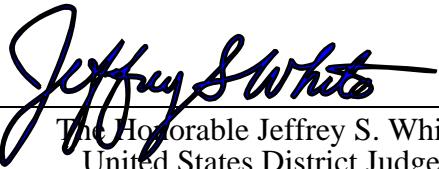
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and this declaration was executed this 14th day of April, 2011.

/s/ Tina E. Hulse
Tina E. Hulse

1 **[PROPOSED] ORDER**
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

4 Dated: April 15, 2011
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The Honorable Jeffrey S. White
United States District Judge
Northern District of California

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